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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Section 202(b))
Table of Allotments)
FM Broadcast Stations)
(Wellington, Texas))

MM Docket No. 97-104
RM No. 9048

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COUNTERPROPOSAL

HUNT BROADCASTING, INC.

Mark N. Lipp

Ginsburg, Feldman and Bress, Chartered
1250 Connecticut Avenue, NW
Washington, DC 20036
(202) 637-9086

Its Counsel

May 19, 1997

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SUMMARY

Hunt Broadcasting, Inc. ("HBI") requests the allotment of Channel 269C to Azle, Texas to provide a first local service to a growing community of 8,868 persons. Denison-Sherman will continue to be well served by three radio stations. Station KDVE(FM) is currently located in an urbanized area (Sherman-Denison) and will be moving to a predominately rural area. The new community of license however is located within the Dallas-Ft. Worth urbanized area. The requisite showing of independence has been made based on the Tuck factors. This proposal will offer a large gain area and population. The loss area will continue to receive at least five aural services.

Only one other channel substitution is required and the licensee of that other station has already agreed to change channels and the transmitter site for the new channel. The parties have also agreed to a reimbursement amount for the changes. The original proposal for Wellington, Texas can also be accommodated with an alternative channel.

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To: Chief, Allocations Branch
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COUNTERPROPOSAL

Hunt Broadcasting, Inc. ("HBI"), licensee of Station KDVE(FM), Denison-Sherman, Texas, and permittee of Station KJKB(FM), Jacksboro, Texas, by its counsel, hereby submits a counterproposal to the Notice of Proposed Rule Making, 12 FCC Rcd 3696 (1997), proposing the allotment of Channel 267C3 to Wellington, Texas as its second local service. Instead, HBI proposes to substitute Channel 269C for Channel 269C1¹ for Station KDVE(FM) and change its community of license from Denison-Sherman, Texas,² to Azle, Texas, as its first local service. In order to effectuate this change, only one channel substitution is necessary³ - Station KLaw(FM),

¹ In MM Docket No. 95-126, Report and Order, 11 FCC Rcd 5316 (1996) Channel 269C1 was substituted for Channel 269C3 at Denison-Sherman, Texas. A Petition for Reconsideration is currently pending in that proceeding.

² In MM Docket No. 95-126, HBI has a pending request to eliminate the hyphenated community of Denison-Sherman and license the station to Sherman.

³ The Channel Study for Channel 269C also indicates a short spacing to Channel 269A at Jacksboro, Texas for Station KJKB. HBI is the permittee of this station.

Lawton, Oklahoma must change from Channel 268C1 to Channel 267C1 at a new transmitter site reference point. The licensee of Station KLAW provides a statement herein consenting to these changes. The substitution of Channel 267C1 at Lawton, Oklahoma is mutually exclusive with the allotment of Channel 267C3 at Wellington, Texas. In support of its counterproposal, HBI states as follows:

Change in the Community of License

1. As indicated in note 2, supra, Station KDVE was modified to operate on Channel 269C1 in MM Docket 95-126, supra. One of the other stations required to change channels in that proceeding filed a petition for reconsideration which did not challenge the allotment of Channel 269C1 per se. Rather, the station raised an issue concerning reimbursement of expenses. HBI has an application pending for Class C1 facilities (BPH-960712IH) which renders the issue moot because that station will no longer need to change channels. Nevertheless, this counterproposal can be processed separate from that proceeding. HBI hereby states that it will apply for and construct a Class C station if allotted in this proceeding regardless of the final outcome of the Class C1 on MM Docket 95-126. Thus, this instant proposal is in no way contingent on or related to the earlier Class C1 upgrade proceeding.

However, in MM Docket No. 95-126, Channel 252A was substituted for Channel 269A at Jacksboro, Texas. As indicated in notes 1 and 2, that proceeding is not yet final. Subsequently, in MM Docket No. 96-10, Channel 299A was substituted for Channel 252A at Jacksboro, Texas. That proceeding is also still pending on reconsideration. Finally, in MM Docket No. 97-96, which is also pending, Channel 237A is proposed to be substituted for Channel 299A at Jacksboro.

2. As demonstrated in the attached Engineering Statement, Channel 269C can be allotted at reference coordinates 33° 23' 20" NL and 97° 43' 03" WL and provide principal community coverage (70 dBu) to Azle as a first local service.

3. The instant proposal to change community of license for Station KDVE complies with Amendment of the Commission's Rules Regarding Modification of FM and TV Authorization to Specify a New Community of License, 4 FCC Rcd 4870 (1989) recons granted in part, 5 FCC Rcd 7094 (1990) ("Community of License"). First, the provision of a first local service to Azle serves a higher priority than the retention of a fourth local service to Denison/Sherman, Texas. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982). Currently, the following stations are licensed to Denison and/or Sherman, Texas: Station KJIM(AM), KXEB(AM), KDSX(AM), KDVE(FM). Second, the proposal to allot Channel 269C to Azle is in conflict with the retention of Channel 269C1 at Denison-Sherman, Texas. See 1.420(i) of the Commission's Rules.

4. Azle (pop. 8,868)⁴ is an incorporated city located partly in Tarrant County and partly in Parker County containing all of the attributes of an independent community. Azle has its own local government, with a city manager and seven council members, its own police department with 22 members on the force, its own fire department with 20 paid employees and 20 volunteers. Azle has its own taxing authority, two zip codes (76020 and 76098), its own

⁴ This figure represents a 34% increase over the 1980 figure of 5,822 persons.

water supply and weekly newspaper. Azle has a Chamber of Commerce and a number of significant businesses, churches, banks, a hospital, school district, (with 6 elementary, 1 middle and 1 high school), five parks, a golf course, and library. See Exhibit 1.

5. Azle is located within the Dallas-Ft. Worth Urbanized Area. Nevertheless, as will be shown, Azle is completely independent of the larger communities. On the other hand, the communities of Denison and Sherman (along with Howe, Texas)⁵ constitute an Urbanized Area. Thus, Station KDVE is not seeking to move from a rural to an urban area. Rather, Station KDVE is actually proposing to move from an urban location to a more rural area. Station KDVE currently covers 100% of the Sherman-Denison Urbanized Area. With its proposed move, Station KDVE will cover less than 5% of an Urbanized Area with a 70 dBu signal.⁶ Most of KDVE's new service area is rural with a significant portion underserved. Due to the significant site restriction for the Class C upgrade, Station KDVE would no longer provide principal community coverage over Denison or Sherman. Thus, KDVE must change community of license to become a full Class C station.

Azle is a Separate, Independent Community

6. In Community of License, supra, the Commission stated that it will not automatically grant a first local service

⁵ The community of Howe, Texas has one FM station KHYI licensed to it.

⁶ The attached Engineering Statement indicates that the penetration of a 70 dBu signal into the urbanized area is actually only 3.87%.

preference to a community if the proposed change is from a rural area to a more urban area. HBI believes that the Commission can fairly conclude that the proposed move is from an existing urban area to a more rural area. Nevertheless, since Azle is located in an Urbanized Area, albeit at its very fringe and the 70 dBu coverage is almost entirely rural, HBI is providing the requisite showing of independence for Commission consideration.

7. The Commission relies primarily on three criteria in determining whether a suburban community should receive a first local service preference: (1) signal population coverage; (2) the size of the suburban community relative to the adjacent city; and (3) the interdependence of the suburban community with the central city.⁷ The Commission has concluded on a number of occasions that the first two factors, while pertinent, are not as significant as evidence of interdependence.⁸ Here the 70 dBu signal will reach less than 5% of the Dallas-Ft. Worth Urbanized Area. Azle is located approximately 68 km (42 miles) from Dallas and 27 km (17 miles) from Ft. Worth. Azle is not contiguous to the Urbanized Area but is separated from other communities in the Dallas-Ft. Worth Urbanized Areas by Eagle Mountain Lake and Lake Worth as well as by land areas.

⁷ See Faye & Richard Tuck, Inc., 3 FCC Rcd 5374 (1988) at ¶ 40.

⁸ Clovis and Madera, California, 11 FCC Rcd 5219 (1996) at ¶ 20; Coolidge and Gilbert, Arizona, 11 FCC Rcd 3610 (1996) at ¶ 9; D'lberville and Wiggins, Mississippi, 10 FCC Rcd 10796 (1995) at ¶ 6.

8. According to the 1990 Census Bureau Report, Azle has a population of 8,868 people, compared to Fort Worth, which has a 1990 Census population of 467,000 people. Azle's population grew from 5,822 in 1980 to an estimated 10,000 in 1996. In demonstrating the interdependence of the community, the Commission will consider eight factors: (1) the extent to which community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's local needs and interests; (3) whether the community leaders and residents perceive the specified community as being an integral part or, or separate from, the larger metropolitan area; (4) whether the specified community has its own local government and elected officials; (5) whether the smaller community has its own telephone book provided by the local telephone company or zip code; (6) whether the community has its own commercial establishments, health facilities, and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising market; and (8) the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries.⁹ Not all of these factors need to be present, however. The Commission has stated that if a majority of the factors indicate that the community is distinct from the urbanized area, it will find that the community should be treated as an independent

⁹ RKO General, Inc., 5 FCC Rcd 3222 (1990).

community.¹⁰ The following information is obtained from the attached Azle, Texas 1997 Community Profile in Exhibit 1.

1) Extent to Which Residents Work in Azle. Azle has 14 major and numerous smaller employers who employ primarily Azle residents. Some of the businesses have up to 100 employees.

2) Newspaper and Media Covering Azle's Needs and Interests. Azle has its own weekly newspaper, Azle News, which covers community events and news stories of interest to Azle residents.

3) Azle is Perceived as Separate From Fort Worth. The extent to which Azle's community leaders and residents perceive Azle as separate from Fort Worth is evident from the number of businesses with the word Azle in their name, including Azle Thrift Store, Jimmie Chandler's Azle TV Service, Azle Travel Agency, Azle State Bank and First National Bank of Azle. In conversations with local residents there is no doubt that Azle residents consider their community separate from Ft. Worth.

4) Local Government and Elected Officials. Azle has its own local government, a city council comprised of seven elected members, a city manager, a city zoning body, its own water supply and sewer system, independent school district and taxing authority.

5) Telephone Book or Zip Code. Azle has its own

¹⁰ See, e.g., Parker and St. Joe, Florida, 11 FCC Rcd 1095 (1996) ¶ 9-11 (the proposed community did not have its own telephone directory or a local newspaper and is included in the urbanized area's market by Arbitron, suggesting the community may not be in a separate advertising market). See also, Cadiz and Oak Grove, Kentucky, 10 FCC Rcd 10785 (1995).

telephone book with 165 pages of resident listings and two zip codes -- 76020 and 76098.

6) Commercial Establishments, Health Facilities and Transportation Systems. Azle has a large number of its own commercial establishments, including the ones identified in subparagraph (3) and those listed on page 4 of Exhibit 1. Azle also has its own hospital and a number of recreational facilities, including five public parks, one area lake, one 18-hole golf course, two tennis courts, three lighted ball fields, six unlighted ball fields, and two volleyball courts. Azle's taxes are used to support its school district with 6 elementary schools, one middle and one high school with enrollment over 3,350 students and a budget over \$25 million. In addition resident's taxes are used for two local hospitals and two junior colleges.

7) Advertising Market. While some advertising aimed at Fort Worth residents will necessarily reach Azle residents by way of television and radio stations, Azle also has advertising opportunities specifically for its residents such as through its local newspaper.

8) Municipal Services. Azle has a number of churches, five parks, a public library, ten full-time and ten part-time paid firemen, and a twenty-two person police force. Azle also supplies its own water and has its own sewage system. The Azle Independent School District is comprised of six elementary schools, one junior high school and one high school and has a total enrollment of 3,355 students.

9. The independence of Azle is analogous to the Commission's decision on reconsideration in Williamsburg and Fort Lee, Virginia, 11 FCC Rcd 5758 (1996). In that case, Ft. Lee was found to be an independent community based on having its own newspaper, zip code, commercial establishment and municipal services and despite not having its own local government. See also Cadiz and Oak Grove, Kentucky, supra.

Azle Deserves a First Local Service

10. Having established that Azle is indeed independent and can more than adequately flourish on its own, HBI will demonstrate that Azle is more deserving of its first local service than the continued retention of a fourth local service to Sherman and or Denison. In the previously cited case involving Williamsburg and Fort Lee, Virginia, supra, the Commission found a first local service to Ft. Lee (pop. 6,895) over Williamsburg, Virginia with two daytime only stations remaining. In addition to relying on priority 3, the Commission found a significant overall gain in population and service area.

11. Here, the current 60 dBu coverage area of Station KDVE as a Class C1 facility from the reference coordinates established in MM Docket 95-126 are as follows: 16,424.5 sq. km and 560,796 persons. The proposed application site for a Class C1 contains 16,179.2 sq. km and 1,061,263 persons. The existing Class C3 service area is 4,695.1 sq. km with 167,411 persons. The instant counterproposal to upgrade Station KDVE to a Class C station at new reference coordinates would provide a 1mV/m coverage area of

26,485.4 sq. km and 1,641,373 population. The gain area and population can be summarized as follows:

<u>Class</u>	<u>Pop. (%)</u>	<u>Area (%)</u>
C Versus C1 (Appl.)	580,110 (35%)	10,306 (39%)
C Versus C1 (Ref. P.)	1,080,577 (66%)	10,061 (38%)
C Versus C3	1,473,962 (90%)	21,790 (82%)

12. It is noted that Station KDVE currently operates as a Class C3 station and only has the potential at this point to operate as a Class C1 facility. HBI has had an application pending for a Class C1 facility for nearly a year but has had difficulty obtaining FAA approval in this site area. Thus, the proposed upgrade to Class C status in a more remote area where FAA approval has already been obtained for a maximum 600 meter tower has a better chance of actual implementation. HBI proposes a mamimum Class C facility and intends to construct a maximum Class C station at 600 meters. With such facilities, a city grade signal (70 dBu) will reach 100% of Azle with nearly 10 km to spare. See Engineering Statement Figures 15 and 16.

13. The above referenced population and area gains are substantial especially when considering the actual Class C3 service area rather than the potential Class C service. These gains provide an additional reason to favor the Azle proposal.

14. The Engineering Statement also analyzes the proposed (Class C1) and actual (Class C3) loss areas. Since Station KDVE does not yet operate as a Class C1 facility there will be no actual

loss area as a Class C1 facility. However, as demonstrated in the Engineering Statement, (Figures 5-10) there are at least five aural services in the potential or actual loss areas. See e.g., Atlantic and Glenwood, Iowa, 10 FCC Rcd 13160 (1995).

Station KLAU, Lawton, Oklahoma

15. Station KLAU currently operates on Channel 268C1 at Lawton, Oklahoma. In order to accommodate the requested allotment of Channel 269C to Azle, HBI proposes to substitute Channel 267C1 at a slight change in the reference point. As indicated in the Engineering Statement, Channel 267C1 must move its reference coordinates by 1.2 km to avoid short spacing to Station KWOX, Woodward, Oklahoma. In Exhibit 2, the licensee of Station KLAU, KLAU Broadcasting Inc, provides a Declaration Statement agreeing to the new reference point and to apply to operate on Channel 267C1 consistent with the Commission's spacing rules. Thus, an Order to Show Cause will not be necessary in this instance. For its part, HBI agrees to reimburse KLAU for the costs of its channel change and any other necessary changes in its facility and has reached a written agreement with KLAU for these costs.

Station KJKB, Jacksboro, Texas

16. The channel study for Channel 269C at Azle in the attached Engineering Statement (Figure 1) contains a listing for Channel 269A at Jacksboro, Texas for Station KJKB. Station KJKB is authorized to Hunt Broadcasting Inc. (license application pending) and is currently operating on Channel 269A. As mentioned in note 3, Station KJKB has already been ordered to move to Channel 252A

(in MM Docket 95-126) to Channel 299A (in MM Docket 96-10) and proposed to move to Channel 237A (in MM Docket 97-96). Nevertheless, the instant proposal for Channel 269C at Azle is consistent with the final outcome of all three docketed proceedings. So that there is no question of a contingency, HBI indicates here that it is willing to change to Channel 299A or Channel 237A as the Commission may ultimately decide in MM Docket 97-96.

17. A channel study is provided for Channel 237A or Channel 299A at Jacksboro in the Engineering Statement. Regardless of the outcome of MM Docket 97-96, a channel will be available for substitution at Jacksboro. No reimbursement is required because HBI is the licensee of KDVE and the permittee of KJKB. Thus, an Order to Show Cause is not needed.

Wellington, Texas

18. The Notice of Proposed Rule Making proposed the allotment of Channel 267C3 to Wellington. However, as indicated in the Engineering Statement, there are several other channels available which can be allotted and provide a second local service to Wellington consistent with HBI's counterproposal. The Engineering Statement indicates that Channels 278C3, 276C3 or 297C3 can be allotted to Wellington. Furthermore, on a comparative basis, a first local service to Azle (pop. 8,868) would be favored over a second local service to Wellington (pop. 2,456).

Madill, Oklahoma and Paris, Texas

19. As mentioned earlier in relation to pending MM Docket 95-


126, Channel 273A was substituted for Channel 272A at Madill, Oklahoma and Channel 280C2 was substituted for Channel 270C2 at Paris, Texas. Should the Commission adopt the proposed Channel 269C allotment at Azle, neither of these substitutions will be necessary. Avoiding two previously ordered channel substitutions is an added benefit to the proposal by eliminating the potential for delay and disruption as well as the reimbursements involved. Nevertheless, as indicated earlier, the instant proposal is also consistent with the earlier ordered substitutions. Thus, no channel substitution at Madill or Paris is necessary as a result of this proposal.

Conclusion

The proposal for Channel 269C at Azle, Texas offers significant public interest benefits, including a first local service, and a large gain in area while not depriving the former city of license of its only local service. Azle is an independent and growing community deserving of its own radio station. Station KDVE has had difficulty obtaining FAA approval for a Class C1 facility but has found an area for a Class C station which already has FAA approval for a maximum 600 meter tower. A change in the community of license is necessary for KDVE to attain Class C status. Accordingly, Hunt Broadcasting Inc., urges the Commission to allot Channel 269C to Azle as its first local service and modify Station KDVE's license accordingly.

Respectfully submitted,

HUNT BROADCASTING, INC.

By: 
Mark N. Lipp

Ginsburg, Feldman and Bress, Chartered
1250 Connecticut Avenue, NW
Washington, DC 20036
(202) 637-9086

Its Counsel

May 19, 1997


Station KLAU(FM)

Lawton, Oklahoma

DECLARATION OF KLAU BROADCASTING, INC.

I hereby consent to have Station KLAU's channel changed from Channel 268C1 to Channel 267C1. I understand that Channel 267C1 must be proposed at another reference point for spacing purposes. Upon FCC approval of the channel change, I will apply for Channel 267C1 in accordance with the Commission's spacing requirements. I am informed that this statement may be used in a filing before the FCC and I hereby authorize its use for that purpose.

I verify that this statement is true, complete and correct to the best of my knowledge and belief.



Ron Rogers
President
KLAU Broadcasting, Inc.



TUELECTRIC

AZLE, TEXAS

1997 COMMUNITY PROFILE

LOCATION

State of Texas
County of Tarrant and Parker
City of Azle

Highway 199

POPULATION

	City	Tarrant County	Parker County
1996 (est.)	10,000	1,279,700	73,800
1990	8,868	1,170,103	64,785
1980	6,097	860,880	44,609
1970	4,493	715,587	33,888

TAXATION

Tax Rate (Per \$100 Assessed Value)

Tarrant/Parker	\$ 0.264836/0.39170
Azle, City	0.55000
Azle ISD	1.35400
Special Districts	
Tarrant Co. Hospital	0.23407
Tarrant Co. Jr. College	0.05772
Parker Co. Hospital	0.13200
Weatherford Jr. Coll.	0.08920
Total	\$ 2.460626/2.51690

Municipal sales tax: 1 %
State sales tax: 6-1/4 %
Eco. Development Sales Tax: %
Other sales taxes: Parker Co. - 1/2 %

GOVERNMENT, CITY

Type: Council/Manager
Number on council: 7
Municipal police: 22
Paid firemen: 10 FT; 10 PT
Volunteers: 20
Insurance key rate: \$.13 (Residential);
 \$.96 (Business)
City zoning body: Yes
Master plan: Yes

UTILITIES

ELECTRIC POWER

TU Electric
Reliability: .999761
Total capacity: 22,449,000 KW
Reserve at system peak: 17.9 %
Transmission voltage: 69 KV 138 KV 345 KV
Service voltage: 120/208 120/240 240/480
 277/480

NATURAL GAS

Lone Star Gas Company
BTU content per cubic foot: 1,050

TELEPHONE

GTE and Southwestern Bell
Digital: Yes
Analog: Yes
ElectroMechanical: None
Make and model: EAX2
Software level: High
Fiber optics: Yes
Switched 56 KBPS: Yes
High capacity digital (T-1): Yes
Digital data service: Yes
911: Yes
Other network/special service:

MAJOR AREA EMPLOYERS

FIRM NAME	PRODUCT	EMPLOYMENT	UNION AFFILIATION
Azie Aviation Products, Inc.	Passenger and operator seats for aircraft	20-49	
Beall Concrete, Inc.	Ready mixed concrete	10-19	
Clark's Precision Machine and Tool	Precision machine tools for the oil field industry	20-49	
Cyclone Aluminum and Steel Handling	Ground glass from scrap glass	10-19	
Futrell Equipment Co.	Wholesale machinery, equip., supplies	1-9	
Hi-Leah Drill Service, Inc.	Metal cutting machine tools	50-99	
Industrial Wood Products, Inc.	Wooden shipping boxes and pallets	10-19	
Medical Designs, Inc.	Hinges for orthopedic braces	20-49	
Metroplex Fabrication and Erection	Structural steel fabrication and erection	10-19	
National Samples, Inc.	Mounting of fabric swatch samples	50-99	
Pierce Precast Concrete	Precast concrete culvert pipe	1-9	
Quality Trailer Products, Inc.	Stamped trailer parts	50-99	
Texas Turbine	Steam, gas, hydraulic turbines	10-19	
TJ Machine and Tool	Aircraft and military hardware	10-19	



Economic and Business Development Department
1-800-421-2489

UTILITIES (continued)

WATER

Supplied by: **City of Azle**
Source: **Eagle Mountain Lake**
Maximum system capacity (daily): **6,000,000 gallons**
Maximum daily use to date: **2,800,000 gallons**
Pressure on mains: **40-80 PSI**
Storage capacity: **2,000,000 gallons**
Size of mains: **2" - 16"**
System looped: **Partially**
Projects under construction: **Utility relocation FM 1886, Hwy. 199**

SEWER SYSTEM

Type treatment plant: **Oxidation ditch and contact stabilization**
Maximum capacity: **1,044,000 gallons**
Maximum daily use to date: **966,000 gallons**
Projects under construction: **Relocation of sewer on FM 730-N**

EDUCATION

Azle Independent School District
Public school budget: **\$ 25,941,604**

	Schools	Enrollment
Elementary	6	943
Intermediate	0	0
Middle/Jr. High	1	922
High schools	1	1,490
Private	0	0

Area universities/colleges:

Texas Christian University, Ft. Worth
Tarrant County Junior College, Ft. Worth
Texas Wesleyan University, Ft. Worth
University of Texas at Arlington, Arlington

State industrial job training: **Yes**
Vocational-technical education programs available: **Yes**

AIR SERVICE

Nearest airport: **Meacham International Airport**
Runway length: **4,000' - 11,000'**
Runway surface: **Asphalt**
Lighted: **Yes**; Fuel: **Yes**
Instrument landing system: **Yes**
Future plans: **Meacham to have commercial service in 1996**
Nearest commercial air service: **Dallas/Fort Worth International**
Distance: **37 miles**

FREIGHT CARRIERS

ABF, ABC, Central Consolidated, Carolina Freight, Jones Trucking, Roadway, Transcom, Steven D. Thompson Trucking

RAIL

None

COMMUNITY INFORMATION

HEALTH CARE

Total hospital beds in city: **48**
Total doctors (medical) in city: **14**

MEDIA

Papers: **1 - weekly**
Radio stations: **0**
TV stations: **Local**; TV cable: **Cablecom**

CHURCHES

Assembly of God, Baptist, Catholic, Church of Christ, Full Gospel Temple, Lutheran, United Methodist, Missionary Baptist, New Lighted Way Christian

INCENTIVES

Tax abatement: **No**
Enterprise zone: **No**
Industrial foundation: **No**
Foreign trade zone: **No**
Reinvestment zone: **No**
Freeport exemption: **No**
Other:

RECREATION

Parks: **5**
Area lakes: **1**
Country clubs: **0**
Health centers: **0**
Public golf courses: **1-18 hole**
Theaters: **0**
Tennis courts: **2**
Other: **3 - lighted ball fields,**
6 - unlighted ball fields,
2 - volleyball courts

CLIMATE

Annual average temperature: **76.5°**
Mo. average high temperature: **96.1°**
Mo. average low temperature: **53.9°**
Annual average precipitation: **32"**
Annual average snowfall: **3"**
Elevation: **484' -864'**

FINANCE

Azle State Bank
First State Bank

OTHER

Libraries: **1**
Hotel rooms: **0**
Motel rooms: **0**
Bed and breakfast facilities: **0**

Occupational Title

Entry Level
\$Low \$High

Production Classifications:

Drill Press Operator	5.50	5.50
Electronics Assembler	4.75	8.35
Electronic - Component Processor	10.60	15.00
Semiconductor Processor		
Etched-Circuit Processor	5.00	5.00
Toolmaker and Related Occupations	5.00	12.00
Welder, Production	4.75	8.35
Sewing Machine Operator, Garment	4.75	7.00
Machinists and Related Occupations	5.55	19.96
Janitor, any industry	4.75	10.00
Truck Driver, Light, any Industry	6.60	13.25

Office, Clerical and Technical:

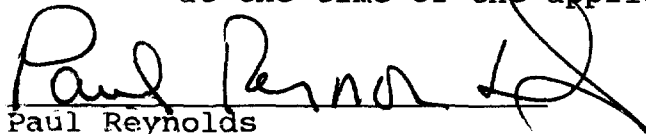
Shipping Clerk	4.75	7.68
Stenographic or Secretarial	5.75	11.96
Computer Operator	7.50	12.85
Accounting Clerk	5.45	13.85

ENGINEERING CERTIFICATION

STATE OF ALABAMA)
)
BUTLER COUNTY)

Paul Reynolds declares the following:

- * That he has completed undergraduate studies in the field of communications at the University of Southern Mississippi.
- * That he has completed course requirements for a Masters Degree in communications at the University of Alabama.
- * That he has completed basic electronics at DeVry Technical Institute.
- * That he has been operating as an independent communications consultant since 1980.
- * That he is familiar with the Commission's Rules and Regulations.
- * That the engineering information for the instant Hunt Counterproposal in MM Docket 97-104 was prepared by me or under my direct supervision.
- * That all information presented is believed to be true and correct and in full compliance of the technical standards contained in the Commission's Rules and Regulations in affect at the time of the applicant's filing date.


Paul Reynolds

REYNOLDS TECHNICAL ASSOCIATES
301 Cedar Street Suite 4
Greenville, AL 36037

(334) 382-3239

Sworn to and subscribed before, this 17 day of MAY, 1997.


Joan K. Reynolds

My commission expires 7-15-2000

**ENGINEERING STATEMENT
IN SUPPORT OF A**

COUNTERPROPOSAL
Channel 267C3, Wellington, Texas
MM Docket 97-104, RM-9048
HUNT BROADCASTING, INC.

C O N T E N T S

FOR ENGINEERING EXHIBITS

1. Statements of Technical Consultants	pages 2-10
2. EXHIBIT E, FIGURE 1	AD 269C Allocation Study
3. EXHIBIT E, FIGURE 2	Gain/Loss Map - AD269C & KDVE C3
4. EXHIBIT E, FIGURE 3	Gain/Loss Map - AD269C & AL 269 C1 Sherman-Denison
5. EXHIBIT E, FIGURE 4	Gain/Loss Map - AD269C & KDVE C1 Application
6. EXHIBIT E, FIGURE 5	Remaining Services - AD 269C to KDVE.L (C3)
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21. EXHIBIT E, FIGURES 20, 21 & 22	Wellington Allocation Studies
22. EXHIBIT E, FIGURE 23	AD269C Modified Allocation Study